



## Division of Human Rights

KATHY HOCHUL  
Governor

MARIA L. IMPERIAL  
Commissioner

September 8, 2022

VIA EMAIL

Gunnar Larson  
xNY,io  
[G@xny.io](mailto:G@xny.io)

Dear Mr. Larson:

This is in further response to your Freedom of Information Law (FOIL) request, received by the Division on March 28, 2022, in which you requested the following:

2021 Apple Card Report

We would like to receive any and all records, relating to NY-DFS' 2021 Apple Card Investigation. This is one part of a broader discussion we must have about equal credit access. On March 23, 2021, Ms. Linda Lacewell published NY-DFS' Findings on Apple Card and its Underwriter Goldman Sachs Bank. As the former Superintendent of NY-DFS, Ms. Lacewell's stone-faced propaganda assured that Apple Card did not discriminate against women, while under Goldman Sachs management. The red flags started to appear when an authorized user drew attention to the following: A person who relies on a spouse's access to credit, and only accesses those accounts as an authorized user, may incorrectly believe they have the same credit profile as the spouse. We recently collated 61 highlights to the Report on Apple Card Investigation from March 2021:

<https://drive.google.com/file/d/1xH16OKyuXzB-MVqIznMWDE9w8RRdmZCw/view> The Apple Card investigation was to assess women's access to equitable finance. The integrity of the Apple Card investigation must be rationally considered as flawed. We would like to receive any and all records of Ms. Linda Lacewell's (emails, texts, and similar) involvement with the 2021 Apple Card report. We would like to receive any and all records to NY-DFS association to evaluating Ms. Linda Lacewell's ability to score a report specific to the Apple Card's

core subject of credit access for women. Finally, we would like to receive any and all records related to NY-DFS guidance on Interlocking Directorates ([https://www.dfs.ny.gov/apps\\_and\\_licensing/banks\\_and\\_trusts/other/Permission\\_for\\_Interlocking\\_Directors\\_and\\_Officers](https://www.dfs.ny.gov/apps_and_licensing/banks_and_trusts/other/Permission_for_Interlocking_Directors_and_Officers)), specific to Apple's Board of Directors and Goldman Sachs' Board of Directors.

The Division intends to produce records responsive to your request to the extent such disclosure is consistent with the provisions of the Human Rights Law and FOIL. However, the Division needs additional time to respond to your request. Therefore, pursuant to Public Officers Law § 89(3)(a), the Division will provide any responsive documents on or before September 29, 2022.

Very truly yours,

A handwritten signature in black ink, appearing to read "Siaka Paasewe".

Siaka Paasewe  
FOIL Officer